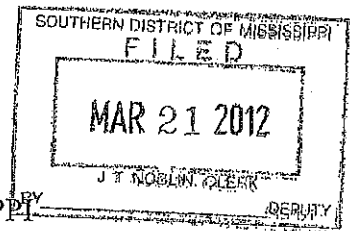


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
JACKSON DIVISION



UNITED STATES OF AMERICA

CRIMINAL No. *3:12CF34CWR-FKB*

v.

DYLAN WADE BUTLER
DERYL PAUL DEDMON
JOHN AARON RICE

18 U.S.C. § 371
18 U.S.C. § 249

The United States Attorney charges:

COUNT 1

From on or about April 1, 2011, through on or about February 15, 2012, in Hinds County, in the Jackson Division of the Southern District of Mississippi, the defendants, **DYLAN WADE BUTLER, DERYL PAUL DEDMON and JOHN AARON RICE**, along with others known and unknown to the government, did knowingly and willfully combine, conspire and agree to willfully cause bodily injury to, and through the use of dangerous weapons, attempt to cause bodily injury to African American persons in and around west Jackson, Mississippi, because of the actual and perceived race and color of those persons. The acts done in furtherance of this conspiracy resulted in the death of J.A..

Manner, Means and Objects of the Conspiracy

1. It was part of the Conspiracy that the defendants and co-conspirators A, B, C, and D all young white men and women, would drive around west Jackson during the night and early morning hours looking for African American persons to verbally harass and physically assault.

2. It was further part of the Conspiracy that the co-conspirators would use dangerous weapons, including, but not limited to beer bottles, sling shots, shod feet, and motor vehicles, to attempt to cause bodily injury to African American persons in and around west Jackson.
3. It was further part of the Conspiracy that the co-conspirators would cause bodily injury to African American persons.
4. It was further part of the Conspiracy that the co-conspirators would particularly target individuals they believed to be homeless and/or under the influence of alcohol or controlled substances because they believed such victims would be less likely to report an assault.
5. It was further part of the Conspiracy that the co-conspirators would encourage each other to cause bodily injury to and to use dangerous weapons in attempting to cause bodily injury to African American persons in west Jackson.
6. It was further part of the Conspiracy that the co-conspirators boasted about their participation in racially motivated physical assaults in west Jackson on prior occasions which involved the use of dangerous weapons and/or resulted in bodily injury to African American victims, thereby keeping other members of the Conspiracy informed of their actions.
7. It was further part of the Conspiracy that the co-conspirators solicited other young, white, men and women to join them while they carried out their plan to harass and assault African Americans.

8. It was further part of the Conspiracy that the co-conspirators concealed and covered up their actions by giving false statements to investigating law enforcement officials.

OVERT ACTS

To advance the Conspiracy and to achieve its aims, defendants **DYLAN WADE BUTLER, DERYL PAUL DEDMON** and **JOHN AARON RICE**, along with others known and unknown to the government, committed various overt acts, within the Jackson Division of the Southern District of Mississippi, including but not limited to the following:

1. On or about June 25, 2011, the defendants and others known and unknown to the government attended a birthday party/bonfire in Puckett, Mississippi for a mutual friend.
2. At some point during the party, the defendants and others known and unknown to the government began talking about going to Jackson, Mississippi to harass and assault African Americans, whom they referred to as "niggers."
3. Several of the co-conspirators actively solicited others at the party to join them in going to Jackson, which they sometimes referred to in derogatory terms as "Jafrica," to "fuck with some niggers," or words to that effect.
4. As the party broke up, the defendants and others known and unknown to the government reconvened at a Texaco gas station off Interstate Highway 20 in Brandon, Mississippi.

5. Defendants **RICE** and **BUTLER**, along with co-conspirators A and B, decided to drive a white Jeep belonging to A to west Jackson to carry out their plan to harass and assault African Americans.
6. Defendants **RICE** and **BUTLER**, along with co-conspirators A and B, agreed that defendant **DEDMON**, and co-conspirators C and D, would later drive defendant **DEDMON**'s green Ford F250 truck to join Defendants **RICE** and **BUTLER**, and co-conspirators A and B in west Jackson.
7. Defendants **RICE** and **BUTLER**, and co-conspirators A and B, drove in the white Jeep to and around west Jackson looking for African Americans to assault.
8. Co-conspirator A was armed with a handgun.
9. As co-conspirator A drove the vehicle around west Jackson, defendants **RICE** and **BUTLER**, and co-conspirator B, hurled glass beer bottles from their moving vehicle at African American pedestrians they encountered.
10. At approximately 4:45 a.m. defendants **RICE** and **BUTLER**, along with co-conspirators A and B, stopped at a Wendy's on Ellis Avenue in west Jackson where they spotted J.A. standing next to his vehicle in the adjacent motel parking lot.
11. Defendants **RICE** and **BUTLER**, along with co-conspirators A and B, decided that J.A., a 47-year-old visibly intoxicated African American man, would be a good target for an assault.

12. Defendants **RICE** and **BUTLER**, along with co-conspirators A and B, debated with one another what to do with J.A. while they waited for defendant **DEDMON** and co-conspirators C and D to arrive in the green Ford F250.
13. It was decided that defendant **RICE** and co-conspirator B would get out of the car to distract J.A. while they waited for defendant **DEDMON** and co-conspirators C and D to arrive in the green Ford F250.
14. Although defendant **DEDMON** and co-conspirators C and D had left Brandon, Mississippi, after the white Jeep, the occupants of the two vehicles had been in contact with each other via electronic text and phone.
15. Defendant **RICE** and co-conspirator B were successful at keeping J.A. in the parking lot of the motel until the green Ford F250 and its occupants arrived at approximately 5:00 a.m..
16. After defendant **DEDMON** and co-conspirators C and D arrived in the green Ford F250, defendant **DEDMON** joined defendant **RICE** and co-conspirator B, who were interacting with J.A. in the parking lot.
17. The physical assault began when defendant **RICE** struck J.A. in the face without provocation, knocking J.A. to the ground.
18. Defendant **DEDMON** then straddled J.A. and struck him repeatedly in the face and head with a closed fist.
19. Once the physical assault ended, defendants **RICE** and **BUTLER**, along with co-conspirators A and B left the motel parking lot in the white Jeep.

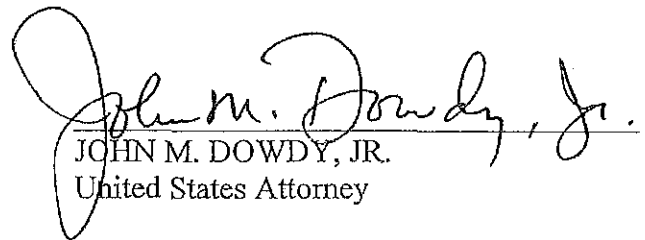
20. At least one of the co-conspirators in the white Jeep yelled, "White Power," as the Jeep left the motel parking lot.
21. Just before defendant **DEDMON** rejoined co-conspirators C and D in the green Ford F250, he yelled, "White Power," and raised his fist in the air.
22. Defendant **DEDMON** returned to the driver's seat of the green Ford F250, and as defendant **DEDMON** and co-conspirators C and D left the parking lot, defendant **DEDMON** deliberately used his vehicle to run over J.A., causing injuries that resulted in J.A.'s death.
23. An occupant of the green Ford F250 yelled a racial slur just before defendant **DEDMON** ran over J.A.
24. Almost immediately after running over J.A., an occupant of the Ford F250 called an occupant of the white Jeep to brag that defendant **DEDMON** "just ran that nigger over," or words to that effect.
25. Over the course of the next few days, some of the co-conspirators agreed to lie to authorities about their reasons for being in Jackson and about their interactions with J.A..

All in violation of Section 371, Title 18, United States Code.

COUNT 2


On or about June 26, 2011, in Hinds County, in the Jackson Division of the Southern District of Mississippi, the defendants, **DYLAN WADE BUTLER**, **DERYL PAUL DEDMON** and **JOHN AARON RICE**, and others known to the Government, aided and abetted by one another, willfully caused bodily injury to J.A., who is African American, by punching J.A. multiple times in the head and face, and using a motor vehicle to inflict bodily injury on J.A. because of his actual and perceived race and color. The death of J.A. resulted from the commission of this offense.

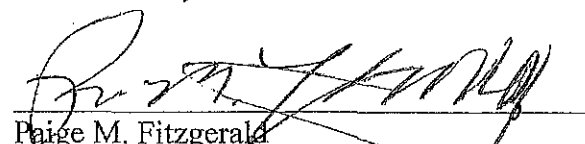
All in violation of Sections 249 and 2, Title 18, United States Code.


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